

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA )  
v. ) Case No.: 2:06-cr-169-WKW  
KOWOSKY TYWAN CHRISTIAN, et al. )**

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**MOTION FOR REIMBURSEMENT OF EXPENSE OF DISCOVERY**

**COMES NOW** the defendant, Kowosky Tywan Christian, through undersigned counsel, Joseph P. Van Heest, and moves to join in the motions for reimbursement of expenses previously filed by co-defendants Wilmer Barnett and James C Talley, and to separately move for reimbursement of funds expended to purchase the discovery provided by the government in this case. In support of this motion, defendant Christian states the following:

1. Discovery in this sixteen co-defendant indictment is voluminous. It consisted of 7,428 paper pages; 10 DVD's; 19 CD's; 1 floppy disc; 6 videotapes; and 23 cases of audiocassette tapes.
2. The United States Attorneys Office made the discovery available through Pro Legal Copies of Montgomery, Inc., to be obtained at the expense of the defendant.
3. Defendant has obtained a complete set of the discovery for which he has been billed a total of \$1,234.35. A copy of that bill is attached as Exhibit A.

WHEREFORE, premises considered, Defendant Christian prays that this Honorable Court will order that undersigned counsel be reimbursed for this extraordinary copying expense.

Dated this 19<sup>th</sup> day of March, 2007.

Respectfully submitted,

s/Joseph P. Van Heest  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: A. Clark Morris, Esq., Assistant U. S. Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

Respectfully submitted,

s/Joseph P. Van Heest  
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